

**REVIEW OF MARINE NATURE CONSERVATION – PAPER WG/14/5/2
STRATEGIC GOALS FOR MARINE NATURE CONSERVATION**

Comments from Wildlife & Countryside Link

Wildlife and Countryside Link is a coalition of the UK's major environmental non-governmental organisations, united by their common interest in the conservation and enjoyment of the natural and historic environment. Between them, Link's thirty-two members turn over more than £700 million per annum, have the support of approximately seven million people, and the help of 81,000 volunteers in the UK. This response is supported by the Marine Conservation Society, the Royal Society for the Protection of Birds, The Wildlife Trusts, the Whale and Dolphin Conservation Society and WWF.



Link represents the interests of environmental voluntary organisations on the RMNC Working Group and submitted a paper on Strategic Goals for Marine Nature Conservation to the RMNC Secretariat in September 2002.



Link welcomes this further opportunity to input to the development of a set of strategic goals for marine nature conservation, which we hope will be proposed for adoption by Government Ministers as part of an over-arching Government policy for the better stewardship of the marine environment.

Link has developed the attached draft set of goals, objectives, targets and principles as a working document based on Link's earlier submission (September 2002); paper WG 14.5.2; Safeguarding Our Seas; the Irish Sea Pilot objectives and papers from English Nature. Whilst this document is still incomplete and requires further input and incorporation of targets and actions, Link would like to submit the attached to illustrate a proposed policy and strategy structure for consideration by the RMNC Secretariat and potentially as a paper for submission to the RMNC Working Group for further input and expansion.



1. Role of Strategic Goals

Link agrees with the overall hierarchy for a vision; strategic goals for the marine environment; strategic goals for marine nature conservation; objectives for nature conservation; actions and targets. We would however argue that for the purposes of presenting this in the final report, the links and relationship with other strategic goals i.e. for a) the sustainable and ecologically sensitive use of marine resources and b) economic benefits and growth in the marine environment management should be clearly laid out. The overall vision for the marine environment can only be achieved effectively if the goals, objectives and actions for all of the five overarching goals, covering both conservation and non-nature conservation purposes are integrated throughout.



Link agrees, in most part, with the key requirements for the establishment of strategic goals for nature conservation, but with the following comments:

With regard to the fourth requirement that the strategic goals *relate to the UK's international commitments*, Link believes that whilst this is important, national commitments must also be a key driver in setting the goals. The UK Biodiversity Action Plan for example, is not directly an international commitment (although it did stem from the Rio Earth Summit), but the targets and actions within that plan should be integrated within the strategic goals and objectives for marine nature conservation.



Link therefore recommends that the fourth bullet be amended as follows:

They should relate to the UK's international commitments and national nature conservation policies

2. Vision and strategic goals for the marine environment

Whilst the paper is based on the strategic goals for the marine environment as set out in the consultation 'Seas of Change', these may not be the final agreed set of strategic goals. Members of Link for example have submitted comments on the current set of strategic goals:

- Inclusion of *restoration* rather than *enhance*, in the first goal
- Insertion of reference to the need for *retaining natural ecosystems* in the second goal
- Reference to the *ecosystem based approach to management* of the marine environment
- Reference to a *unifying marine planning system* to manage the demands of existing and proposed activities in the marine environment and so protect marine biodiversity

It is therefore important that this set of over-arching goals is finalised as soon as possible, as some changes if made will lead to changes in the goals and objectives for marine nature conservation.

3. Strategic goals for marine nature conservation

In the Link submission to the RMNC Secretariat on strategic goals for nature conservation, we proposed an overall goal:

To protect and conserve marine biodiversity, its natural processes and the overall environmental quality of our seas and restore these where they have been degraded

Link believes that it is very difficult and perhaps unwise to look at this goal in isolation of the other four over-arching goals, all of which have a bearing on conservation of biodiversity. Link is not clear what process is being applied to develop the strategic goals of each of the other four over-arching goals (resource use; employment; understanding and public awareness). Link believes that the RMNC should seek to provide input in the final report on the goals, objectives, actions etc for all of these strategic goals for the marine environment. Whilst it may be argued that, for example, the goal for environmentally sustainable employment may be outwith the RMNC's remit, the other four all have a very clear bearing on marine nature conservation and cannot usefully be separated.

Indeed, if we are to apply the ecosystem-based approach to protecting marine biodiversity then we must address the management of activities that impact on biodiversity. This therefore means that in order to propose realistic and effective proposals for marine nature conservation, the RMNC needs to look at the objectives needed to deliver the other four overarching goals for the marine environment.

The potential cross-over between the current five goals is already highlighted in the WG 14.5.2 paper, as one of the suggested marine nature conservation goals is (f) *to deepen understanding and awareness of marine ecosystems, to ensure policy development takes place on the basis of the best evidence possible*. This is closely aligned to the fourth over-arching goal: 'To increase our understanding of the marine environment, its natural processes and our cultural marine heritage. Many of the objectives needed to deliver these two goals will be very similar. If the goals and objectives for nature conservation are developed in isolation from the other goals, Link is convinced this will lead to confusion and duplication of effort at a later stage.

Link recommends that the RMNC take on the role of co-ordinating the development of goals and objectives for all five of the key goals for the marine environment and set up a working group involving other departments and stakeholders as necessary to initiate this process as soon as possible.

4. Specific strategic marine nature conservation goals

a) To halt the deterioration in the state of the UK's marine biodiversity.

Link supports this goal as far as it goes but believes that, in line with the WCL recommendation for an amended overarching goal, *restoration* should be included.

Link recommends this goal be amended to:

To halt by 2010 the current deterioration in the state of the UK's marine biodiversity and by 2015 have ensured its recovery and then maintain biodiversity at a level, which supports the integrity and productivity of marine ecosystems.

There is no goal for maintaining or restoring natural processes – this has been included as an objective under this goal in the attached Link paper.

b) To identify, protect and conserve marine structures which have a key role in contributing to biodiversity and provide essential habitats to support the variety of marine life.

Link suggests that the inclusion of the term 'identify' is inappropriate within a goal or objective – the process of identification of marine features is an action required to achieve protection and conservation of those features. We also suggest that the term 'to further the protection and conservation' is used in preference, as this is more proactive than simply to protect and conserve. Link also queries the use of the term marine 'structures', as this is not a term that is being widely used to refer to marine features and is open to interpretation. We also feel that protection should not be limited to just those features which have a key role in contributing to diversity (arguably all species and habitats contribute to biodiversity), but features which play a key role in ecosystem functioning are also of particular concern.

This 'goal' is in fact one of the measures that would be needed to achieve goal (a) above and so in the attached Link document we have included a modified version of this as an objective under the first goal:

Further the protection and conservation of marine features which have a key role in contributing to biodiversity and / or provide essential habitats to support the variety of marine life or the integrity and functioning of marine ecosystems.

With supporting actions to:

- *Establish criteria and identify habitats and species of importance by 2004.*
- *Develop a network of representative and well-managed marine protected areas that protect marine features of ecological, archaeological, scientific or educational interest at a national and local level by 2010.*

c) To maintain the water quality of the marine environment to support biodiversity.

With the advent of the Water Framework Directive, the term water 'quality' is being superseded by the term 'status' and this should be reflected here. Whereas water 'quality' generally refers to the quality of water as measured against fixed standards for various contaminants, 'status' also involves the general ecological status of water bodies as well. Maintenance of water quality indicates that the status quo is acceptable when in fact this is not the case. Anthropogenic contaminants also affect the food chain, which should be recognised here.

Link recommends that this goal be amended to:

To improve and then maintain the water quality of the marine environment at a status which supports the full range of natural ecosystem functions or processes, productivity and biodiversity naturally characteristic of UK waters and which eliminates anthropogenic contamination of the food chain.

d) To integrate marine nature conservation into wider activities and plans affecting the marine environment.

Link supports this objective, but suggests a similar goal but with a slightly different emphasis as an alternative:

To ensure that all policies, plans, programmes and projects that affect the marine environment provide for the protection of marine biodiversity.

e) To develop and promote an ecosystem-based approach to the UK's marine landscapes.

Link is unclear as to the meaning of this in its specific reference to UK marine landscapes. We understand that marine landscape is a term that has been agreed by the RMNC, but this term is rather limited in its scope and could be misinterpreted as just referring to the seabed, whereas the water column and sea surface are equally important for nature conservation and water quality. It would be useful therefore if this term is used with clarification e.g. footnote, or is broadened to apply to the protection of marine biodiversity in general.

Insertion of the words '*To develop, promote and establish a strategy for making operational an ecosystem-based approach to **the protection of the UK's marine biodiversity***' could be more appropriate.

However, terminology aside we are not sure that this sits well as a strategic goal. The implementation of an ecosystem based approach is more of a means to an end and is also one of the principles underlying the Marine Stewardship Report vision, so Link feels that it should be treated separately as a principle or approach, which underlies all the goals and objectives and should be incorporated into the final RMNC strategic goals paper. In the attached Link document, we have incorporated the ecosystem approach as an objective under Goal (3) and also incorporated it as one of the underlying approaches that Government should apply in delivering stewardship of the marine environment.

f) To deepen understanding and awareness of marine ecosystems, to ensure policy development takes place on the basis of the best evidence possible.

Link believes that it is not just increasing our understanding of marine ecosystems that is important, but also applying this knowledge more effectively in the decision-making process.

A preferred form of wording is:

To increase and broaden understanding and the application of knowledge about marine ecosystems to provide the best available information for policy development and decision-making processes.

g) To engage positively in international fora to influence others' activities which impact on the UK's marine biodiversity directly and indirectly.

This is not perceived to be a strategic goal, more of an underlying approach or principle, and has been incorporated as such in the attached Link working document.

In paragraph 9 it should be noted that the paraphrasing of the commitment under ASCOBANS has misrepresented the commitment made there. The general aims agreed by Parties with regard to incidental take include "to restore and/or maintain populations of small cetaceans at the level they would reach when there is the lowest possible anthropogenic influence" and "to minimise (ie. to

ultimately reduce to zero) anthropogenic removals". This is the commitment that should be mentioned with of course the need also to restore populations where necessary.

5. Using the strategic goals to develop more specific objectives

The example list of specific objectives is a useful starting point but as the paper states will need to be the subject of further consideration. In further developing these objectives it would be helpful if the specific objectives were listed under the strategic goals for nature conservation to which they principally relate. It then becomes easier to see what is needed in order to move towards meeting the strategic goals.

Link has developed the attached draft set of goals, objectives, targets and principles as a working document based on Link's earlier submission (September 2002), paper WG 14.5.2, the Marine Stewardship Report, the Irish Sea Pilot objectives and papers from English Nature. We submit this as a proposed structure for consideration by the RMNC Secretariat and potentially as a paper for submission to the RMNC Working Group for further input and expansion.